



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

AUG 20 2001

400 Seventh Street, S.W.
Washington, D.C. 20590

Mr. Eugene Y. Ngai
Vice President Corporate
Development and Technology
Solkatronic Chemicals
351 Philadelphia Avenue
Morrisville, PA 19067

Ref. No. 01-0169

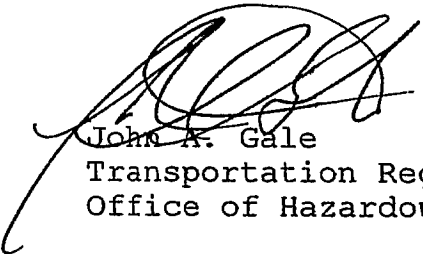
Dear Mr. Ngai:

This is in response to your letter dated June 29, 2001, requesting clarification of labeling requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the empty label required under § 173.428 for an empty radioactive material package may be used for a cleaned and purged packaging that formerly contained a non-radioactive hazardous material.

The answer is yes. A shipper may apply the empty label depicted in § 172.450 to an empty packaging that formerly contained a hazardous material of any hazard class.

I hope this satisfies your request.

Sincerely,,



John A. Gale

Transportation Regulations Specialist
Office of Hazardous Materials Standards



DOT/OHME/EASTERN REGION

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June 29, 2001

BAH
§173.428
Labeling
01-0169

Mr. David Clark
US Department of Transportation
820 Bear Tavern Road
Suite 306
West Trenton, NJ 08628

Dear Mr. Clark:

The US Transportation Regulations under 49CFR173.428 mandates the use of an empty label for radioactives. Can this same label be used for cylinders that have been cleaned and purged of their contents? Or is its use restricted only to radioactives?

We have been using these labels to indicate empty cylinders as defined under 173.29.

Sincerely,

Eugene Y. Ngai
Vice President Corporate
Development & Technology

